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Ms. Jane E. Henney, Commissioner  
Food and Drug Administration  
Parklawn Building  
5600 Fishers Lane  
Rockville, MD 20857

Dear Ms. Henney:

In public statements on genetically engineered food, US government spokespeople often state that US consumers "don't care" about whether food is genetically engineered or whether it is labeled. We have been informed by reporters and visiting foreign dignitaries that US government officials often make similar assertions in private.

We are very concerned about this mischaracterization of US public opinion. Polling data does not support the US government assertion. In separate polls funded by Time, Novartis, and USDA itself, when asked if they want labeling of genetically engineered food, US consumers say yes, by a margin of 82 to 93%. Even when the question is worded in a biased fashion, as it was in two IFIC polls, implying that FDA believes there is no scientific basis to labeling and that it will be costly and confusing, 37% still say they want labeling.

All major US consumer organizations, including Consumers Union, Public Citizen, Center for Science in the Public Interest, Consumer Federation of America, and Consumer Choice Council, as well as many environmental organizations, also support labeling of genetically engineered food.

We hope that in the future if you or members of your department have occasion to discuss US public opinion on this issue, that you will refer to the fundamental and consistent finding that 82-93% of US consumers, as well as all major consumer organizations, state that they want labeling of genetically engineered food.

For your information, we have enclosed a summary of public opinion surveys prepared by the Consumer Policy Institute, which reflects all major opinion surveys on this subject of which we are aware conducted in the last decade.

Sincerely,

Jean Halloran, Director  
Consumer Policy Institute

Mark Silbergeld, Co-Director  
Washington Office, Consumers Union

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# **Consumer Policy Institute**

Consumers Union

## **Summary of Public Opinion Surveys Related to Labeling of Genetically Engineered Foods**

### ***US Surveys – Genetically Engineered Food***

#### **CNN Poll – May 20, 1999**

CNN conducted an on-line, interactive quickvote on May 20, 1999, following a report in the journal Nature that genetically engineered corn posed a serious threat to the survival of the monarch butterfly. The poll question posed by CNN was "A study found bio-engineered corn can harm butterflies; should such crops be put on hold pending more study?" As of May 24, 1999, of 26,179 responses, 75% or 19,543 people agreed there should be a hold on GE crops until further study had been conducted, 25% or 6,636 people disagreed.

#### **Time Magazine– January 11, 1999**

In "Brave New Farm," by James Walsh, reporting on opposition to GEFs, a box titled "What People Think" reported responses to two questions: "Should genetically engineered food be labeled as such? 82% yes, 14% no. If food were labeled as genetically engineered, would you buy it for yourself or your family? 28% yes, 58% no." Sample size was not indicated.

#### **International Food Information Council – March, 1997 & February, 1999**

The International Food Information Council (IFIC) conducted phone surveys to 1000 households on consumer perceptions of the safety and need for labeling of genetically engineered foods in March, 1997 and February, 1999. Both polls got similar results. The poll asked "Some critics of the U.S. FDA policy say that any food produced through biotechnology should be labeled even if the food has the same safety and nutritional content as other foods. However, others, including the FDA, believe such a labeling requirement has no scientific basis, and would be costly and confusing to consumers. Are you more likely to agree with the labeling position of the FDA or with its critics?" In 1999, 58% agreed with "FDA" and 37% agreed with the "critics." In the 1999 poll, 38% indicated awareness that products of biotechnology are currently in supermarkets.

#### **Novartis, Inc. — February 24, 1997**

Novartis, Inc., one of the five large international companies that is developing genetically engineered seed, conducted a survey of American consumers which was released on February 24, 1997 at the first International Conference on Regulation of Crop Protection and its Implication for the Food Supply, sponsored by Tufts University and the Foundation for Nutritional Advancement. According to a press release on the results of the survey, "Most Americans want foods that are genetically altered to be clearly identified with labels. 93% of

Americans who responded to a recent survey by the world's largest agribusiness company agree that bioengineered food should be labeled as such, including 73% who strongly agree with the position." Sample size was not indicated.

**Public Perceptions of Agricultural Biotechnology: A survey of New Jersey Residents", William Hallman, and Jennifer Metcalfe, 1995. Obtained from USDA Website.**

A 1995 USDA funded survey of 604 New Jersey residents' attitudes on agricultural biotechnology, showed that 84% of those polled wanted mandatory labeling of engineered fruits and vegetables. The executive summary stated: "Most of New Jersey's population (84%) also thinks that fruits and vegetables created by genetic engineering should have special labels on them. The preference for such labels seems to stem more from the consumer's desire to make an informed buying decision rather than to avoid genetically engineered foods. Sixty percent of the population would consider buying fresh vegetables if they were labeled as having been produced by genetic engineering. Similarly, people are also very much in favor (76%) of farmers voluntarily putting labels on their produce that say they were not genetically engineered."

**Food R&D, — February, 1995.**

An item in the Executive Editor's monthly column in Food R&D "Food Futurists Predict Trends," by D.A Maki, states "92% of consumers say they think genetically engineered produce should be labeled . . . reports *Fresh Trends*, a 36,000 consumer survey by Vance Publishing Corp. The survey found that more women than men, 94% versus 84%, respectively, want to see genetically engineered products such as Calgene Inc.'s *Flavr-Savr* tomato, identified."

**Report to Extension Service, USDA, T.J. Hoban, and P.A. Kendall. 1992. A survey of consumer attitudes about the use of biotechnology in agriculture and food production.**

85% of those polled thought that labeling of products of genetically engineering was "very important."

**US Surveys — Milk from Cows Treated with Genetically Engineered bGH/bST**

**"Comparison Of National and Poor Households: Results Of A Survey Of Consumer Knowledge and Risk Perception Of Food-Related Biotechnologies" by R. Douthitt, L. Zepeda, and D. Grobe, 1996. Special Report No. 68, Institute for Research on Poverty.**

This survey, funded by USDA, is based on an extensive new nationwide survey of over 1,900 primary household food purchasers, from March to June, 1995. The study found that 94% of consumers believed that milk should be labeled to distinguish milk from rbGH-treated cows. Furthermore, 10% of milk drinkers say they buy products from non-treated cows. The study showed that concern over rbGH has increased since approval by the FDA. More than 74% of consumers said

they were concerned about the possible discovery of negative long-term effects on human health associated with rbGH.

**PRODIGY Subscriber Survey, posted March 9, 1994.**

PRODIGY is an interactive computer information service. A total of 8,000 subscribers responded to this survey. 81% of those taking the poll thought milk containers should be labeled to indicate whether or not the milk comes from cows treated with the hormone. When broken down by sex, 92% of women and 78% of men supported mandatory labeling.

**Wisconsin Public Radio, February, 1994**

A total of 446 telephone interviews were conducted by St. Norbert College and Wisconsin Public Radio with a representative sample of Wisconsin adults between Feb. 19 - 27, 1994. Some 88% of respondents favored mandatory labeling of dairy products that come from cows treated with rbGH, while 9% opposed mandatory labeling and 3% were unsure. Even among those who felt the hormone is safe, a majority supported mandatory labeling (62%). Most of those polled were somewhat familiar (64%) or very familiar (19%) with the issue.

**"The Implications Of rbST For Consumers, Farmers and Taxpayers--A Survey Of The Economic Literature and Additional Analysis", by D.G. Raboy and T. Simpson, for Johanna Dairy, released February 11, 1993.**

A survey conducted by the law firm Patton, Boggs & Blow for their client Johanna Dairy is cited in this study. In that survey, 98% of the consumers supported labeling to show whether or not dairy products came from hormone treated herds.

**"Introducing Food Produced Using Biotechnology: The Case of Bovine Somatotropin". Department of Agricultural Economics. Staff Paper 90-60, by A.M. McGuirk, W.P. Preston, and G.M. Jones. 1990. Blacksburg, VA; Virginia Polytechnic Institute.**

This survey showed 85% of consumers supporting labelling of dairy products to tell consumers whether or not they were hormone treated.

**"Consumer Acceptance Of Food Production Innovations--An Empirical Focus On Biotechnology and BST", by B.J. Slusher, 1990. Paper presented at the Second International Conference on Research in the Consumer Interest, Snowbird, UT, Aug. 9-11, 1990. MO Agricultural Experiment Station Journal, Series Number 11, 254.**

This survey from the University of Missouri showed 95% of consumers supporting labeling of dairy products to tell consumers whether or not they were hormone treated.

**"Wisconsin Consumers' Attitudes Toward Bovine Somatotropin (BST) and Dairy Product Labeling" by R.A. Douthitt. June, 1990. 17 pp.**

In this survey by the University of Wisconsin when consumers were asked if they supported labeling of dairy products to show whether or not they came from treated herds, about 68% of consumers supported labeling. Among those aware of the rbGH/rbST controversies, 77% supported such a measure.

### ***Other Evidence of U.S. Support for Labeling of Genetically Engineered Foods***

In 1992, the U.S. Food and Drug Administration (FDA) made public a proposed policy for how they would regulate genetically engineered foods of plant origin and asked for public comment. Over 4,000 consumer comments poured into the agency, with a majority of the comments asking for labeling of genetically-engineered foods. Eight state Attorneys General have asked the FDA to require mandatory labeling of all genetically-engineered foods, as has the American Association of Retired Persons.

### ***Canada***

#### **Toronto Star Poll, "Public Prefers Genetically Modified Food To Be Clearly Labeled" June 2, 1998.**

In a poll conducted by the *Toronto Star* the issue posed was, "In Canada, genetically engineered food must be labeled only when it changes the nutritional value or could pose a health risk to some people. Should all genetically engineered foods be labeled?" Of those polled, 98% said yes, while 2% said no.

#### **Industry Canada, 1994, OPTIMA survey.**

Survey sponsored by Industry Canada showed that 83 to 94% of Canadians want foods to be specifically labeled when they are produced using biotechnology (depending on how the question was asked).

### ***United Kingdom***

#### **Consumers Association, "Genetically Modified Food: Consumer Awareness and Attitudes," February 26, 1999**

An opinion poll involving 1914 adults, representative of the population. Face to face interviews were carried out between 2/19/99 and 2/25/99. Of the people polled 90% were aware of the existence of Genetically Modified Foods (GEF's). Of those who had heard of GEF's 94% supported clear labeling on food packaging, and 92% felt that processed foods containing GEF's should be labeled as well, even though tests may not be able to detect their presence due to the processing. When eating out 74% of those polled wanted labeling.

#### **The Guardian, "Gene Genie", by J. Vidal, June 4, 1998**

An opinion poll involving 500 adults, was conducted by *The Guardian* and ICM. Three questions in the opinion poll dealt with labeling: "Do you think that foods

that have been genetically modified should be clearly labeled?", 96% yes, 3% no. Should ingredients derived from genetically modified foods be labeled?" 95% yes, 3% no. "If there is doubt about whether an ingredient comes from a genetically modified source or not, should it be labeled as genetically modified?" 89% yes, 7% no.

### *European Union*

#### **EUROBAROMETER 46.1, European Commission Directorate General XII. European Opinions on Modern Biotechnology, 1997.**

This survey asked about labeling in an inverse fashion. Respondents were asked if they agreed or disagreed with the statement "It is not worth putting special labels on genetically modified food." The survey found, "Only 18% of Europeans tend to agree that it is not worth putting special labels on genetically modified foods and only 8%, have no opinion. In other words, a large majority of respondents (74%) think these products should be clearly labeled."

### *Australia*

#### **Australian Financial Review, "All Transgenic Food To Be Labeled", by C. Bolt, December 18, 1998.**

In a story about how the Australia New Zealand Food Standards Council (Health Ministers) voted 6 to 4 to require mandatory labeling of all genetically engineered foods, the article states "Surveys showed more than 80% of consumers want full labeling."

#### **Canberra Times, Australian Department of Industry, Science and Technology Survey, cited July 3, 1995.**

A national government survey of consumers in Australia which involved 1,378 people found that 89% said that a genetically engineered tomato (similar to the FlavrSavr) should be labeled so that people could decide whether they wanted to eat it or not; 4% were against labeling. Interestingly, although many said they would eat various genetically engineered foods, a clear majority would be against unlabelled GEFs. Thus, 65% thought labeled engineered tomatoes would be a "good idea" or "very good idea", while virtually the same percentage, 65%, thought an unlabeled engineered tomato would be a "bad idea" or "very bad idea."